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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE APPLE IPHONE ANTITRUST LITIGATION

DONALD R. CAMERON, *et al.*,

                Plaintiffs,

     v.

APPLE INC.,

                Defendant

CASE NO. 4:11-cv-06714-YGR

CASE NO. 4:19-cv-03074-YGR

DECLARATION OF MARK ROLLINS IN SUPPORT OF APPLE INC.'S STATEMENT IN RESPONSE TO ORDER TENTATIVELY DENYING ADMINISTRATIVE MOTION TO MODIFY CASE SCHEDULE [DKT. 330]

Hon. Yvonne Gonzalez Rogers
Hon. Thomas S. Hixson

Gibson, Dunn &
Crutcher LLP

Pursuant to Civil Local Rule 79-5, I hereby declare as follows:

1.   I am employed as a Finance Manager at Apple Inc. ("Apple") and work with the Apple engineers to collect the transactional data requested in this matter.   I have personal knowledge of the facts stated below and, if called as a witness, I could and would testify competently thereto.   I submit this declaration in support of Defendant Apple Inc.'s Statement in Response to Order Tentatively Denying Administrative Motion to Modify Case Schedule ("Motion to Modify Case Schedule").

2.   The "proceeds_reason" field is duplicative of other information already included in the transactional dataset.   The "proceeds_reason" field is a binary value indicating whether the transaction was associated with a 15% commission due to a subscription lasting more than one year.   The larger dataset already shows, however, whether a developer has subscribed for over a year and the App Store's commission falls from 30% to 15% for subscriptions after their first year.   The "proceeds_reason" field had to be reverse engineered to map to the data set in the billings database that Apple has currently collected.

3.   Once the "proceeds_reason" field was mapped, the engineers must re-extract the entire data set, download the current dataset to the hard drives and conduct additional quality control testing prior to production.   For the most part, it is not possible to do this work simultaneously; rather, it must be accomplished in steps.   Unavoidably, the additional efforts to include the "proceeds_reason" field will delay the production of the transactional data.   Specifically, I estimate it would take an additional, approximately 130 hours to complete the remaining work necessary to produce the complete data set, and an additional 50 hours to include the "proceeds_reason" field.

4.   Because of the sensitivity and quantity of data Apple is producing, engineers must physically access buildings on Apple's campus to extract the data to hard drives—an effort complicated by the access restrictions necessitated by the COVID-19 pandemic.   These efforts are further complicated by Apple's operational shut down for the approximately two weeks before and immediately after New Year's Day.   Nonetheless, Apple is working diligently to accomplish these tasks.

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DECLARATION OF MARK ROLLINS IN SUPPORT OF APPLE INC.'S STATEMENT IN RESPONSE TO
DECEMBER 18 ORDER; CASE NO. 4:11-CV-06714-YGR,CASE NO. 4:19-CV-03074-YGR

5.   I inquired with the Apple engineers whether it was possible to produce the transactional data ordered by Magistrate Judge Hixson by December 31, 2020, and the engineers have confirmed it is not.   Instead, Apple estimates that it will produce the data by or before January 22, 2021.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed on December 28th, 2020 at Santa Clara, California.

Mark Rollins

DECLARATION OF MARK ROLLINS IN SUPPORT OF APPLE INC.'S STATEMENT IN RESPONSE TO DECEMBER 18 ORDER; CASE NO. 4:11-CV-06714-YGR, CASE NO. 4:19-CV-03074-YGR

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